

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE SYMBOL TECHNOLOGIES, INC.)
SECURITIES LITIGATION)
) Case No.: 05-cv-3923
) (DRH-AKT)
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**NOTICE OF MOTION AND MOTION BY LEAD PLAINTIFF FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

POMERANTZ LLP

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Class Counsel

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiff and Class Representative Ironworkers Local #580 Pension Fund (“Lead Plaintiff”) hereby moves this Court, the Honorable Denis R. Hurley, United States District Judge of the United States District Court for the Eastern District of New York, Long Island Courthouse, 100 Federal Plaza, Central Islip, NY 11722, for entry of an Order (1) preliminarily approving the proposed Settlement between Lead Plaintiff and Defendants Symbol Technologies, Inc. (“Symbol” or the “Company”), and its former directors and officers Salvatore Iannuzzi, Todd Abbott, James M. Conboy, William R. Nuti and Mark T. Greenquist (collectively, “Defendants”); (2) appointing KCC Class Action Services as Claims Administrator; (3) approving the form and manner of disseminating notice to the Class; (4) scheduling a hearing to consider final approval of the Settlement, an award of attorneys’ fees and expenses, and a compensatory award to Lead Plaintiff; and (5) setting deadlines for the dissemination of notice, the submission of proofs of claim, the filing of objections, and the filing of Lead Plaintiff’s Counsel’s motion for final approval of the Settlement and application for attorneys’ fees and expenses and a compensatory award to Lead Plaintiff. A table setting forth the requested schedule of events is on page 14 of the accompanying memorandum of law and set forth below:

Notice and Claim Form mailed to potential Class Members and published to website (Preliminary Approval Order, ¶ 8)	14 calendar days after entry of the Preliminary Approval Order
Summary Notice published (Preliminary Approval Order, ¶ 13)	21 calendar days after entry of the Preliminary Approval Order
Deadline for papers in support of Settlement, Attorneys’ Fees and Expense Award, and Award to Lead Plaintiff (Preliminary Approval Order, ¶ 22)	35 calendar days before the Settlement Hearing
Objection Deadline (Preliminary Approval Order, ¶ 19)	21 calendar days prior to the Settlement Hearing
Deadline for Lead Plaintiff to file response to objections and other reply papers in support of Settlement (Preliminary Approval	7 calendar days before the Settlement Hearing

Order, ¶ 23)	
Final Approval Hearing	To be determined by the Court, approximately 90 days after entry of the Preliminary Approval Order
Deadline to file Proofs of Claims (Preliminary Approval Order, ¶ 15a)	120 calendar days after entry of the Preliminary Approval Order

Dated: April 30, 2018

Respectfully Submitted,

POMERANTZ LLP

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*Lead Counsel for Ironworkers Local #580
Pension Fund and the Class*

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April 2018, I electronically filed the foregoing unopposed motion for preliminary approval of class action settlement with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Michael J. Wernke
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